

MOSER LAW FIRM, PC



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June 30, 2025

VIA ECF

Hon. Arlene R. Lindsay, USMJ
United States District Court, Eastern District of New York
100 Federal Plaza
Central Islip, NY 11717

Re: *Cruz v Demarco Bros Landscaping & Tree Service Corp*,
Case No. 2:23-cv-9200 (GRB)(ARL)

Dear Judge Lindsay:

I represent the Plaintiffs in the above-referenced matter. Please accept this joint motion with Defendants' counsel, Michael P. Giampilis, seeking to extend the deadline for completion of discovery to September 30, 2025. The Defendant Theodore Passelis was deposed on May 27, 2025. The transcript of his testimony was made available to Defendants on June 23, 2025. The four (4) Plaintiffs have not yet been deposed.

The parties respectfully request that the Court direct as follows:

1. Plaintiffs will furnish written notice of deficiencies and additional discovery demands, if any by July 8th, 2025 with responses from Defendants due by July 28, 2025.
2. Defendant Theodore Passelis shall testify at his continued deposition on or before August 1, 2025.
3. Plaintiffs shall be deposed virtually on or before August 8, 2025.
4. Defendants shall have the right to serve any post-deposition demands on Plaintiffs within 20 days after all Plaintiffs depositions are completed and Plaintiffs will respond to said demands within 20 days after receipt of same.
5. All fact discovery shall be completed or before September 30, 2025.

Respectfully Submitted,

Steven J. Moser

CC: All counsel of record via ECF